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*Attorneys for Defendants Thomson Reuters Corporation,
Thomson Reuters Holdings Inc.,
Thomson Reuters Canada Limited, and Thomson Reuters Applications Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,	:	
<i>as assignee of individuals who are Covered</i>	:	
<i>Persons, JANE DOE-1, a law enforcement</i>	:	CIVIL ACTION NO. 2:24-CV-04269
<i>officer, JANE DOE-2, a law enforcement</i>	:	
<i>officer, EDWIN MALDONADO, SCOTT</i>	:	
MALONEY, JUSTYNA MALONEY,	:	
PATRICK COLLIGAN, PETER	:	
ANDREYEV, and WILLIAM SULLIVAN	:	

Plaintiffs

v.

THOMSON REUTERS CORPORATION,	:	
THOMSON REUTERS HOLDINGS INC.,	:	
THOMSON REUTERS CANADA LIMITED,	:	
THOMSON REUTERS APPLICATIONS	:	
INC., RICHARD ROES 1-10, <i>fictitious names</i>	:	
<i>of unknown individuals, and ABC</i>	:	
COMPANIES 1-10, <i>fictitious names of</i>	:	
<i>unknown entities,</i>	:	

Defendants

**STATEMENTS AND DISCLOSURES BY DEFENDANTS THOMSON REUTERS
CORPORATION, THOMSON REUTERS HOLDINGS INC., THOMSON REUTERS
CANADA LIMITED, THOMSON REUTERS APPLICATIONS, INC.**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rules 10.1 and 11.2 of this District Court, Defendants Thomson Reuters Corporation, Thomson Reuters Holdings Inc., Thomson Reuters Canada Limited, and Thomson Reuters Applications Inc. (“Defendants”), by and through its undersigned counsel, certifies and makes the following statements:

Defendants’ Corporate Disclosure Statements

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendant Thomson Reuters Corporation certifies and makes the following disclosure: Thomson Reuters Corporation is a publicly traded corporation and no publicly held corporation owns 10% or more of Thomson Reuters Corporation’s outstanding stock. Additionally, pursuant to Rule 7.1(b) and because jurisdiction in this matter is based on diversity under 28 U.S.C § 1332(a), Thomson Reuters Corporation, by and through its undersigned counsel, also hereby certifies that its place of incorporation is Ontario, Canada and its principal place of business is at 19 Duncan Street, Toronto, ON M5H 3H1, Canada.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendant Thomson Reuters Holdings Inc., certifies and makes the following disclosure: Thomson Reuters Holdings Inc. is Delaware corporation. It is an indirect and wholly owned subsidiary of Thomson Reuters Corporation, a publicly held corporation. There are no immediate or intermediate parent corporations or subsidiaries of this entity that are publicly held, and there are no publicly held companies that own 10% or more of their shares. Additionally, pursuant to Rule 7.1(b) and because jurisdiction in this matter is based on diversity under 28 U.S.C § 1332(a), Thomson Reuters Holdings Inc., by and through its undersigned counsel, also hereby certifies that, while fraudulently joined for reasons set out in its notice of removal, its place of incorporation is

the State of Delaware, USA and its principal place of business is at 3 Times Square, New York NY 10036, United States.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendant Thomson Reuters Applications Inc. certifies and makes the following disclosure: Thomson Reuters Applications Inc. is a Delaware corporation. It is an indirect and wholly owned subsidiary of Thomson Reuters Corporation, a publicly held corporation. There are no immediate or intermediate parent corporations or subsidiaries of this entity that are publicly held, and there are no publicly held companies that own 10% or more of their shares. Additionally, pursuant to Rule 7.1(b) and because jurisdiction in this matter is based on diversity under 28 U.S.C § 1332(a), Thomson Reuters Applications Inc., by and through its undersigned counsel, also hereby certifies that, while fraudulently joined for reasons set out in its notice of removal, its place of incorporation is the State of Delaware, and its principal place of business is at 2900 Ames Crossing Road, Suite 100, Eagan, MN 55121, United States.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendant Thomson Reuters Canada Limited certifies and makes the following disclosure: Thomson Reuters Canada Limited is a company organized under the laws of the Province of Ontario, Canada. It is an indirect and wholly owned subsidiary of Thomson Reuters Corporation, a publicly held corporation. There are no immediate or intermediate parent corporations or subsidiaries of this entity that are publicly held, and there are no publicly held companies that own 10% or more of their shares. Additionally, pursuant to Rule 7.1(b) and because jurisdiction in this matter is based on diversity under 28 U.S.C § 1332(a), Thomson Reuters Canada Limited, by and through its undersigned counsel, also hereby certifies that its place of incorporation is Ontario, Canada, and its principal place of business is at 19 Duncan Street, Toronto, ON M5H 3H1, Canada.

D.N.J. Local Civil Rule 10.1 Statement

1. Pursuant to Local Civil Rule 10.1(a), the addresses of the named parties are as follows:

2. Plaintiff Atlas Data Privacy Corporation is a Delaware corporation, with offices at 201 Montgomery Street, Suite 263, Jersey City, New Jersey 07302.

3. Plaintiffs Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, Peter Andreyev, and William Sullivan (collectively, the “Individual Plaintiffs”) are natural persons. The Individual Plaintiffs did not disclose their street addresses in the Complaint. Defendants are not otherwise aware of their locations.

4. Plaintiffs are represented by Rajiv D. Parikh, Esq. and Kathleen Barnett Einhorn, Esq. of GENOVA BURNS LLC, 494 Broad Street, Newark, NJ 07012 and John A. Yanchunis, Esq., MORGAN & MORGAN, 201 N. Franklin St., 7th Floor, Tampa, FL 33602.

5. Defendant Thomson Reuters Corporation is now, and was at the time this action was commenced, incorporated in Canada, with its headquarters located at 19 Duncan Street, Toronto, ON M5H 3H1, Canada.

6. Defendant Thomson Reuters Canada Limited is now, and was at the time this action was commenced, incorporated in the Province of Ontario, Canada, with its headquarters located at 19 Duncan Street, Toronto, ON M5H 3H1, Canada.

7. Fraudulently Joined Defendant Thomson Reuters Holdings, Inc., is now, and was at the time this action was commenced, incorporated in Delaware, with its headquarters located at 3 Times Square, New York, NY 10036, United States.

8. Fraudulently Joined Defendant Thomson Reuters Applications, Inc., is now, and was at the time this action was commenced, incorporated in Delaware, with its headquarters located at 2900 Ames Crossing Road, Suite 100, Eagan, MN 55121, United States.

9. Defendants Richard Roes 1-10 and ABC Companies 1-10 are fictitious names of unknown natural persons and entities. Defendants are not aware of the street and post office addresses of Richard Roes 1-10 or the principal places of business of ABC Companies 1-10.

10. Defendants Thomson Reuters Corporation, Thomson Reuters Canada Limited, Thomson Reuters Holdings, Inc., and Thomson Reuters Applications, Inc., are represented by Marcel S. Pratt and John W. Scott of Ballard Spahr LLP, 1735 Market Street, Fl. 51 Philadelphia, PA 19103-7599.

D.N.J. Local Civil Rule 11.2 Statement

Pursuant to Local Rule 11.2, the undersigned counsel, on behalf of Defendants, certifies that the matter in controversy is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding.

Dated: April 3, 2024

Respectfully submitted,

BALLARD SPAHR, LLP

/s/ Marcel S. Pratt

Marcel S. Pratt

John W. Scott (*pro hac vice forthcoming*)

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Attorneys for Defendants Thomson Reuters Corporation, Thomson Reuters Holdings Inc., Thomson Reuters Canada Limited, and Thomson Reuters Applications Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on the date set forth below, I caused a copy of the foregoing document to be served via electronic filing on all counsel of record.

Dated: April 3, 2024

/s/ John W. Scott

John W. Scott